

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

RAMON ANTONIO MONTANEZ MARTINEZ  
ZORAIDA ESQUILIN RODRIGUEZ

DEBTORS

CASE NO. 11-10531-BKT

CHAPTER 13

**DEBTORS' REPLY TO RNPM, LLC'S OBJECTION  
TO POST CONFIRMATION OF PLAN, DOCKET #67**

**TO THE HONORABLE COURT:**

**NOW COME, RAMON ANTONIO MONTANEZ MARTINEZ and ZORAIDA ESQUILIN RODRIGUEZ**, debtors in the above captioned case, through the undersigned attorney, and very respectfully state and pray as follows:

1. On April 7, 2014, RNPM LLC ("RNPM") filed an opposition to the confirmation of post-confirmation modification of Plan, docket #67, stating that the debtors' post-confirmation modification of Plan, docket #64, may not be confirmed because "[t]he proposed plan is predicted on repaying claim #7 (RNPM's secured claim) through loss mitigation", and "[i]n is as much as the loan modification has not yet been approve we oppose the proposed plan of reorganization...". *RNPM's Objection to Post Confirmation of Plan*, paragraphs 3-4, docket #67.

2. The debtors hereby respectfully submit that on March 31, 2014, they filed a motion requesting this Honorable Court an Order of approval in order to continue the loan modification process through a loss mitigation program, docket #66.

3. Furthermore, on April 26, 2014 the debtors filed a motion requesting entry of Order of approval to continue said loan modification process with actual secured creditor RNPM, LLC, claim 7-2, (since mortgage loan was transferred from original secured creditor Oriental Bank, who filed original proof of claim 7-1), docket #72, as the motion requesting Order of approval, docket #66, was neither granted nor denied by the Court.

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4. Moreover, on April 29, 2014 this Honorable Court granted Order of approval to continue the loan modification process through a loss mitigation program, docket #74.

5. The debtors respectfully submit that with said Order of approval granted by the Court they are now able to continue the loan modification process with secured creditor RNPM. Once said modification is approve by the bank it will be submitted for evaluation to the Trustee in this case and to this Honorable Court for its approval.

6. Based on the above stated, the debtors respectfully understand that they have replied to RNPM's objection and respectfully request the Court to deny RNPM's motion objecting post confirmation of Plan, in the above captioned case.

**WHEREFORE**, based on the above stated, the debtors respectfully request this Honorable Court deny RNPM's objection to post confirmation Plan, docket #67, in the above captioned case.

**I CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of the same to: the Chapter 13 Trustee, Alejandro Oliveras Rivera, Esq. I also certify that a copy of this motion was sent via US Mail to the debtors, Ramon Antonio Montanez Martinez and Zoraida Esquilin Rodriguez, to their address of record: HC 03 Box 7157 Juncos PR 00777.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 2<sup>nd</sup> day of May, 2014.

/s/ Roberto Figueroa Carrasquillo  
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